

REMARKS

This is intended as a full and complete response to the Final Office Action dated March 19, 2003, having a shortened statutory period for response set to expire on June 19, 2003.

Applicants request reconsideration and withdrawal of the finality of this office action for the purpose of entering the new grounds of rejection presented by the Examiner. Applicants respectfully submit that Applicants' previous amendment did not necessitate the new grounds of rejection presented because the amendments to the independent claims included elements that were presented in the original claims set.

In the case where the finality of the office action is not withdrawn, Applicants submit this amendment to place the application in condition for allowance or in better form for appeal.

Claims 1-12, 20-26, 32-39, 57-59 and 61-64 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Tubel et al., U.S. Patent No. 5,662,165 (Tubel '165) and Cretin et al., U.S. Patent No. 5,481,502 (Cretin). As discussed in the previous amendment, Tubel '165 discloses a dedicated, closed-ended communication system in which a remote central control center communicates wirelessly or through telephone wires with a plurality of well platforms. Tubel '165 does not teach, show or suggest a control system having a server through which one or more remote controllers communicate with the surface control and data acquisition systems. Cretin discloses a server set for managing data storage disks that store data from various local permanent stations that are connected on a network. Cretin also discloses a mobile station connected to the network that can access data from the storage disks managed by the server set. However, Cretin does not teach, show or suggest a remote controller connected through the server. These references, alone or in combination, do not teach, show or suggest a control system having a server through which one or more remote controllers communicate with the surface control and data acquisition systems. Therefore, applicants submit that claims 1-12, 20-26, 32-39, 57-59 and 61-64 are patentable over Tubel '165 and Cretin.

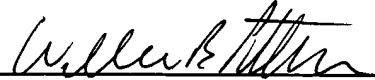
Claims 13-19 and 27-31 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Tubel '165 and further in view of Patterson, U.S. Patent No. 6,089,832. As discussed above and previously, Tubel '165 does not teach, show or suggest a control system having a server through which one or more remote controllers communicate with the surface control and data acquisition systems. Patterson discloses a retrievable downhole pump system. These references, alone or in combination, do not teach, show or suggest a control system having a server through which one or more remote controllers communicate with the surface control and data acquisition systems. Therefore, applicants submit that claims 13-19 and 27-31 are patentable over Tubel '165 and further in view of Patterson.

Claims 42-56 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Tubel '165 and Streetman U.S. Patent No. 6,209,642, and further in view of Rinaldi, U.S. Patent No. 6,089,832. As discussed above and previously, Tubel '165 does not teach, show or suggest a control system having a server through which one or more remote controllers communicate with the surface control and data acquisition systems. Streetman discloses a system which posts production data to an Internet web site. Rinaldi discloses a system for determining optimum reservoir productivity. These references, alone or in combination, do not teach, show or suggest a control system having a server through which one or more remote controllers communicate with the surface control and data acquisition systems. Therefore, applicants submit that claims 42-56 are patentable over Tubel '165 and Streetman, and further in view of Rinaldi.

Claim 60 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Tubel '165 and Cretin, and further in view of Streetman '642. Tubel '165 and Cretin and Streetman '642 have been discussed above. These references, alone or in combination, do not teach, show or suggest a control system having a server through which one or more remote controllers communicate with the surface control and data acquisition systems. Furthermore, these references, alone or in combination, do not teach, show or suggest a remote controller having Internet access and communicates with a server through the Internet. Therefore, applicants submit that claim 60 is patentable over Tubel '165 and Cretin, and further in view of Streetman '642.

In conclusion, the references cited by the Examiner, neither alone nor in combination, teach, show, or suggest the method or process of the present invention. Having addressed all issues set out in the office action, applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



William B. Patterson
Registration No. 34,102
MOSER, PATTERSON & SHERIDAN, L.L.P.
3040 Post Oak Blvd., Suite 1500
Houston, TX 77056
Telephone: (713) 623-4844
Facsimile: (713) 623-4846
Attorney for Applicants